

**UNITED STATES DISTRICT COURT
FOR THE
WESTERN DISTRICT OF WISCONSIN**

J.J., by and through his next friend,
Saleena Jackson; **K.D.**, by and through
her next friends, John Levy and Meranda
Davis; **C.M.**, by and through his next friend
Toinette Ducksworth; **R.N.**, by and through
his next friend Gloria Norwood, **M.S.**, by
and through his next friend Jolene Waupekanay;
A.V., by and through his next friend Veronica
Rocha-Montejano; **M.R.**, by and through his next
friend Autumn Rodgers; **S.K.**, by and through her
next friend, Thomas Korn; and **A.P.**, by and
through her next friend, Louise Plaskey, for
themselves and all others similarly situated,

Plaintiffs,

v.

Case No.: 17-CV-47

JON E. LITSCHER, in his official capacity
as Secretary of the Wisconsin Department
of Corrections; **JOHN D. PAQUIN**, in his
official capacity as Administrator of
Division of Juvenile Corrections of the
Wisconsin Department of Corrections;
WENDY A. PETERSON in her official capacity
as Superintendent of the Lincoln Hills
School for Boys and the Copper Lake
School for Girls; **BRIAN GUSTKE**, in his official
Capacity as Director of Security for the Lincoln
Hills School for Boys and the Copper Lake
School for Girls,

Defendants.

DECLARATION OF KARI BEIER

I, KARI BEIER, being first duly sworn upon oath, declare and state as follows:

1. I am in charge of recruiting for the State of Wisconsin Department of Corrections (“DOC”), including recruiting for staff at Lincoln Hills School for Boys (“LHS”) and Copper Lake School for Girls (“CLS”).
2. I make this declaration based on my own personal knowledge.
3. The DOC does not prioritize its recruiting and hiring qualified youth counselors based on their individual credentials. The DOC does not prioritize its recruiting process based on geography or race.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 25th day of May, 2017.

By: *s/ Kari Beier*
KARI BEIER